

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

SIMPSON VENTURES, INC.,

Plaintiff,

v.

**MIDWEST METAL PRODUCTS
COMPANY, INC.**

Defendant.

2007 AUG 24 A 9:39

) DEBRA P. HACKETT, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

) Case No.: 3:07-CV-048-WHA

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)

MOTION TO ADMIT COUNSEL *PRO HAC VICE*

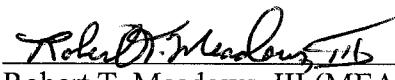
Comes now the Plaintiff, Simpson Ventures, Inc., by and through its undersigned counsel who is a member in good standing of this Court, and moves the Court to allow Joseph Wendell Staley of the law firm of Gardner, Groff, Greenwald & Villanueva, P.C. to appear of record in the above-entitled cause and participate *pro hac vice* in this civil action pursuant to Local Rule 83.1(b). As grounds for this motion, Simpson Ventures, Inc. shows the Court as follows:

1. Joseph Wendell Staley is an attorney licensed to practice law in the State of Georgia, having been admitted in 2006. He is a member in good standing of the bar of Georgia. He is registered to practice before the United States Patent and Trademark Office. He is also admitted to practice in the United States District Court for the Northern District of Georgia as evidenced by the Certificate of Good Standing which is attached hereto and made a part hereof as Exhibit A. Concurrent with the filing of this motion, Mr. Staley has paid the \$20.00 fee for his admission *pro hac vice*.

2. Mr. Staley is familiar with the law, facts and procedures related to the subject matter of this litigation and his law firm has represented Simpson Ventures, Inc. for several years.

WHEREFORE, THE PREMISES CONSIDERED, Simpson Ventures, Inc. moves this Court to enter an order permitting Joseph Wendell Staley of the law firm of Gardner, Groff, Greenwald & Villanueva, P.C. to appear of record and participate *pro hac vice* before the United States District Court, Middle District of Alabama, for the purpose of representing Simpson Ventures, Inc. in this case.

Respectfully submitted,



Robert T. Meadows, III (MEA012)
Attorney for the Plaintiff Simpson Ventures, Inc.

OF COUNSEL:

CAPELL & HOWARD, P.C.
3120 B. Frederick Road (36801)
P.O. Drawer 2268
Opelika, Alabama 36803-2268
334.501.1540 (ph)
334.501.4512 (fax)

CERTIFICATE OF SERVICE

I hereby certify that on this the 14th day of August, 2007, I have served the above and foregoing Motion on the Defendant by serving them at the following address:

Mr. Brett A. Ross, Esq.
Mr. Gregory A. Brockwell, Esq.
Carr Allison
100 Vestavia Parkway
Birmingham, Alabama 35216

Mr. James M. Hinshaw, Esq.
Bingham McHale, LLP
2700 Market Tower
10 W. Market Street
Indianapolis, IN 46204-4900

Robert D. Meadows, III
OF COUNSEL



CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA
NORTHERN DISTRICT OF GEORGIA

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} ss.
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I, James N. Hatten, Clerk of the United States District Court for the Northern District of Georgia,

DO HEREBY CERTIFY that **JOSEPH WENDELL STALEY, 142571**, was duly admitted to practice in said Court on MAY 22, 2006 and is in good standing as a member of the bar of said Court.

Dated at Atlanta, Georgia, this 31st day of July, 2007.

JAMES N. HATTEN
CLERK OF COURT

By: Phyllis Brannon
Phyllis Brannon
Deputy Clerk

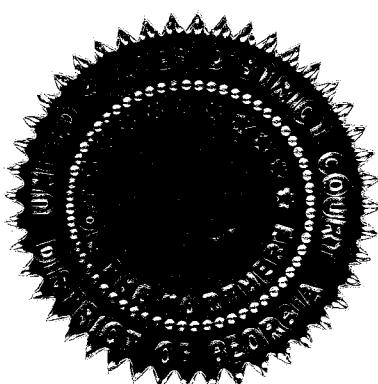


Exhibit A

Court Name: U S DISTRICT COURT - AL/M
Division: 2
Receipt Number: 4602000218
Cashier ID: khaynes
Transaction Date: 08/24/2007
Payer Name: CAPELL AND HOWARD

PRO HOC VICE
For: CAPELL AND HOWARD
Case/Party: D-ALM-A-TT-YF-EEFUND-001
Amount: \$20.00

CHECK
Check/Money Order Num: 000774
Amt Tendered: \$20.00

Total Due: \$20.00
Total Tendered: \$20.00
Change Amt: \$0.00

Case Action No. 3:07-cv-048-WHA

m/phv- Joseph Wendell Staley